

CRAFTSMAN'S CRIBSHEET

 NUMBER
25

Miles Free – Director of Technology and Research



Technical



Regulatory



Quality



Management

DO YOUR PARTS MEET THE ARTICLE EXEMPTION TEST FOR REACH?

For an object to be considered an article, the following conditions should be fulfilled:

The shape, surface or design of the object must:

1. *be obtained during production and be special;*
2. *be relevant for the function of the object;*
3. *be more important for the function than the chemical composition of the object.*

Precision machined products easily meet these conditions:

1. **The shape, surface or design of the object must be obtained during production and be special.**
 - The shape and many surfaces of precision machined parts are created by stock removal during production and are regarded as "special."
 - Precision machined products are custom produced (special) at the order of the customer.



Photo courtesy of Miles Free

- They have different dimensions and technical characteristics, as specified by the customer at the time of the order.
 - Their surfaces are developed during production to meet the customer's (special) dimensional and geometric requirements.
2. **The shape, surface or design of the object must be relevant for the function of the object.**
 - It is axiomatic that the custom design of the precision machined product is to create the needed form, fit and function in order to assure desired performance and function.
 3. **The shape, surface or design of the object must be more important for the function than the chemical composition of the object.**
 - Precision machined products are machined from a variety of metallic alloys, including steel, stainless steel, aluminum, brass and many others of varied compositions.
 - These compositions are varied and determine manufacturability as well as influence mechanical properties, though they are not sole determinants of those properties.
 - Without final precision machining to special size, form and geometry, the raw material itself would not provide the needed function demanded by the customer.

Bottom line: Precision machined products are clearly "articles" as defined by Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), and so exempt from regulation.